



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live*

*Evan Bayh*  
Governor  
*Kathy Prosser*  
Commissioner

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Telephone 317-232-8603  
Environmental Helpline 1-800-451-6027

**RECEIVED**  
DEC 7 1993

**VIA CERTIFIED MAIL** - P730-167-868

Mr. Keith A. Nagel  
Environmental Control Engineer  
LTV Steel Corporation  
3100 East 45th Street  
Cleveland, Ohio 44127

December 1, 1993  
**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA, REGION 5

US EPA RECORDS CENTER REGION 5



1003917

Dear Mr. Nagel:

Re: Closure Certification Report  
SPL Tank  
LTV Steel Company, Inc.  
East Chicago, Indiana  
IND 005462601

The Indiana Department of Environmental Management (IDEM) acknowledges receipt of your letter dated August 17, 1993 containing a Closure Report Addendum for the spent pickle liquor (SPL) tank. The IDEM has reviewed the report and offers the following comment:

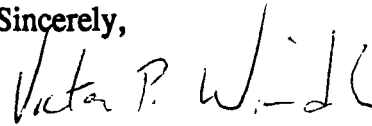
The response to comment #3 indicated that one sample (SB-1A) still exceeds the new clean-up level for chromium. The IDEM recommends excavating a three (3) foot diameter hole around the aforementioned boring, as indicated in the attached drawing to a depth of six (6) inches. No verification samples will be required since adjacent and deeper samples all meet the cleanup level.

The submittal of documentation that this step has been taken should complete closure activities for this unit. At that time, the IDEM will provide written notification releasing LTV from financial requirements.

Mr. Keith A. Nagel  
Page 2

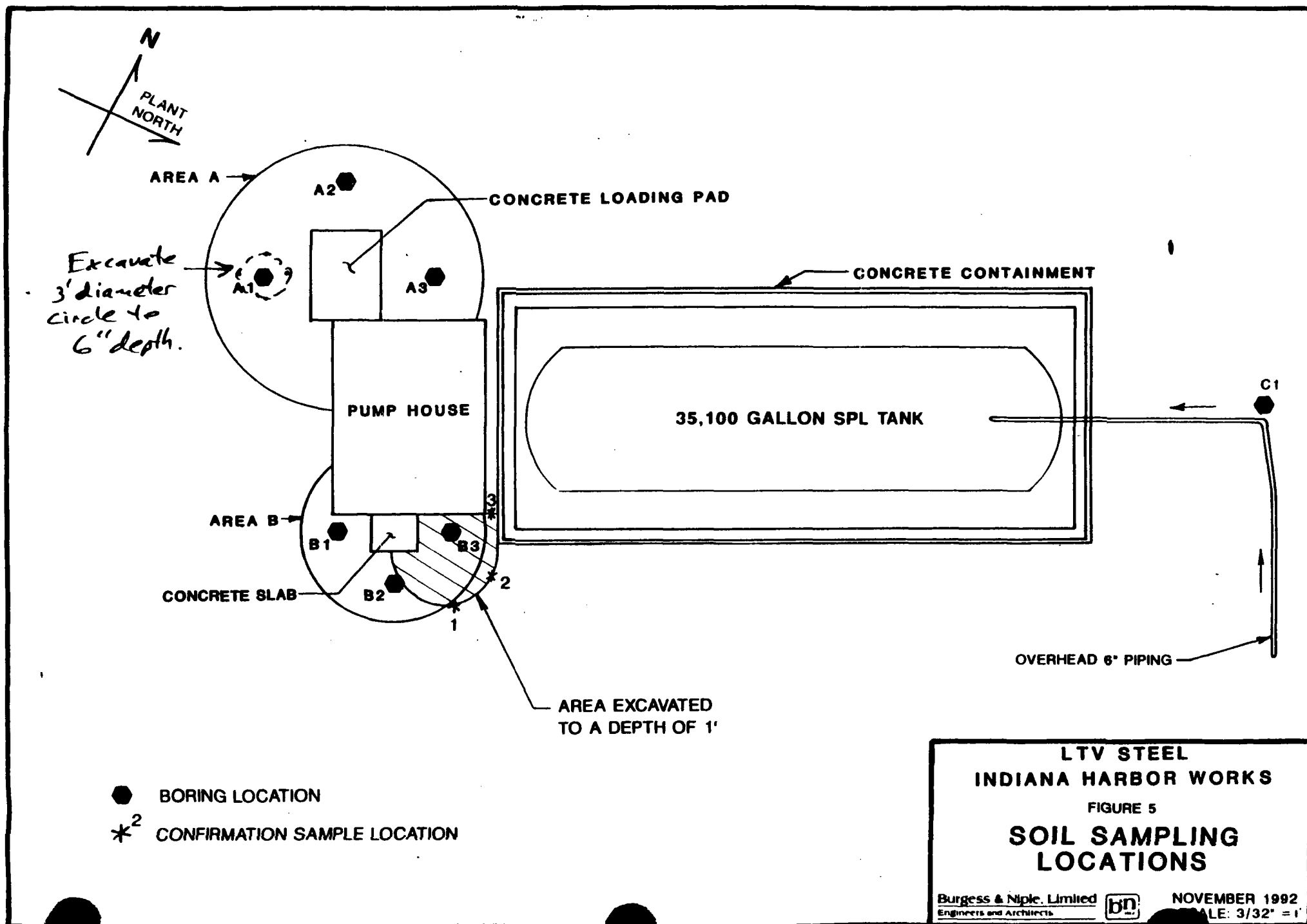
If you have any questions regarding this matter, please contact Ms. Paula Bansch at 317/232-3243.

Sincerely,

A handwritten signature in black ink, appearing to read "Victor P. Windle". The signature is written in a cursive, slightly slanted style.

Victor P. Windle, Chief  
Plan Review and Permit Section  
Hazardous Waste Management Branch  
Solid and Hazardous Waste Management

cc: Mr. Hak Cho, U.S. EPA, Region V  
Mr. Barry Steward, IDEM  
Ms. Rosemary Cantwell, IDEM  
Mr. Bruce Kizer, IDEM



**LTV STEEL  
INDIANA HARBOR WORKS**

**FIGURE 5**

**SOIL SAMPLING  
LOCATIONS**

Burgess & Niple, Limited  
Engineers and Architects



NOVEMBER 1992  
SCALE: 3/32" = 1'

# FILE

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Evan Bayh  
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105 South Meridian Street  
Box 6015  
Indianapolis, Indiana 46206-6015  
Telephone 317-232-8603  
Environmental Helpline 1-800-451-6027

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JUN 20 1993

VIA CERTIFIED MAIL - P125-270-756

**OFFICE OF RCRA** June 15, 1993  
**Waste Management Division**  
**U.S. EPA, REGION V**

Mr. L. A. Szuhay  
Corporate Environmental Control  
LTV Steel Company  
3100 East 45th Street  
Cleveland, Ohio 44127

RECEIVED JUL 01 1993  
WMD RCRA  
RECORD CENTER *Part A*

Dear Mr. Szuhay:

Re: Closure Certification  
Notice of Deficiency  
SPL Tank  
LTV Steel Company  
East Chicago, Indiana  
IND 005462601

The Indiana Department of Environmental Management (IDEM) acknowledges receipt of your November 24, 1992 closure certification for the SPL Tank, located at LTV Steel Company, East Chicago, Indiana. The certification has been reviewed and determined to be inadequate.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies. The information requested by the NOD must be submitted before the certification may be considered technically adequate.

The information requested must be received by this office within sixty (60) days of receipt of this notice. Please submit three (3) copies of the requested information to the IDEM at the address above.

If you have any questions regarding this matter, please contact Ms. Paula Bansch at 317/232-3243.

Sincerely,

*Victor P. Windle*  
Victor P. Windle, Chief  
Plan Review and Permit Section  
Hazardous Waste Management Branch  
Solid and Hazardous Waste Management

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure) ✓  
Mr. Barry Steward, IDEM (with enclosure)  
Mr. Bruce Kizer, IDEM (with enclosure)  
Ms. Rosemary Cantwell, IDEM (with enclosure)

Notice of Deficiency  
Closure Certification  
SPL Tank  
LTV Steel Company  
East Chicago, Indiana  
IND 005462601

1. The approved Closure Plan specified the analysis of soil samples using SW-846 method 7190/7191 for chromium and 7420/7421 for lead. However, the analytical results provided in the Closure Certification indicate the use of SW-846 method 6010 for both analytes. Provide the rationale for using the different method.
2. The approved Closure Plan specified that lab duplicate and lab spike samples (five each) would be analyzed and the results provided with the analytical results. The Closure Certification states that these samples were analyzed, but the results are not provided in this document. Provide these results.
3. The Closure plan states that the background samples would be collected in a representative slag filled area which was chosen because it had not been affected by facility operations. However, the Closure Certification did not provide a description of the materials encountered in the background sampling as it did for the directed sampling.

The analytical results of the background samples are much higher than the SPL Tank Area samples. These background results produced extremely high "clean levels" for both chromium and lead. The IDEM's concern is that the background samples were taken in an area that was not representative of the material at the SPL Tank Area.

Provide a description of the materials found in the background samples, information as to when or what materials were placed in both locations as fill material, and a justification for using the background samples as representative of the materials encountered at the SPL Tank Area.

4. The closure certification by the owner/operator does not specify that the hazardous waste management unit was closed in accordance with the specifications in the approved closure plan, as required by 40 CFR 265.115. Please revise.

RECEIVED DEC 16 1992  
WMD RCRA  
RECORD CENTER

LTV Steel Company



November 24, 1992

Indiana Department of Environmental Management  
105 S. Meridian Street  
P.O. Box 6015  
Indianapolis, IN 46206-6015

RECEIVED  
NOV 30 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Attn: Mr. Victor Windle, Chief  
Plan Review and Permit Section  
Hazardous Waste Management Branch  
Solid and Hazardous Waste Management

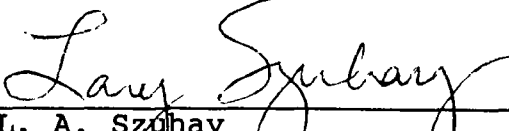
Re: LTV Steel Company  
East Chicago, Indiana  
IND 005462601  
SPL Tank Closure Certification

Dear Mr. Windle:

Enclosed are an original and three copies of the final report for the spent pickle liquor tank closure and certification for the above referenced facilities. The work and certification was completed in the required 180 day timeframe. Your approval letter, received by LTV Steel on May 27, 1992, requests that LTV Steel's response indicate the facility's desired future status. The SPL tank unit, and all other RCRA units at the facility, operate as 90 day accumulation units. Proper documentation and certification regarding other original RCRA Part A units were previously forwarded to IDEM. The facility's status should, therefore, be changed to that of generator.

Please contact me if you have any questions or require anything additional.

Sincerely,

  
L. A. Szohay  
Manager, Solid & Hazardous Waste  
Corporate Environmental Control

LAS/dcr  
Enclosure

cc: Ms. Paula Branch, IDEM  
Mr. Hak Cho, USEPA Region V  
Ms. Fayola Wright, USEPA Region V  
Lake County Health Department  
(All w/cover letter only)